

**EXHIBIT A**

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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| <p>In re:</p> <p>AD1 Urban Palm Bay, LLC</p> <p style="text-align: center;">Debtor.</p>          | <p>Chapter 11</p> <p>Case No. 23-10074 (KBO)</p> <p><b>Docket Ref. No. _____</b></p> |
| <p>In re:</p> <p>AD1 Urban Palm Bay Place, LLC</p> <p style="text-align: center;">Debtor.</p>    | <p>Chapter 11</p> <p>Case No. 23-10075 (KBO)</p>                                     |
| <p>In re:</p> <p>AD1 Urban Strategy Palm Bay, LLC</p> <p style="text-align: center;">Debtor.</p> | <p>Chapter 11</p> <p>Case No. 23-10076 (KBO)</p>                                     |
| <p>In re:</p> <p>AD1 LBV1, LLC</p> <p style="text-align: center;">Debtor.</p>                    | <p>Chapter 11</p> <p>Case No. 23-10077 (KBO)</p>                                     |
| <p>In re:</p> <p>AD1 LBV Hotels, LLC</p> <p style="text-align: center;">Debtor.</p>              | <p>Chapter 11</p> <p>Case No. 23-10078 (KBO)</p>                                     |
| <p>In re:</p> <p>AD1 SW Property Holdings, LLC</p> <p style="text-align: center;">Debtor.</p>    | <p>Chapter 11</p> <p>Case No. 23-10079 (KBO)</p>                                     |

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| In re:<br><br>AD1 Urban SW, LLC<br><br>Debtor.                  | Chapter 11<br><br>Case No. 23-10080 (KBO) |
| In re:<br><br>AD1 Palm Beach Airport Hotels, LLC<br><br>Debtor. | Chapter 11<br><br>Case No. 23-10081 (KBO) |
| In re:<br><br>AD1 PB Airport Hotels, LLC<br><br>Debtor.         | Chapter 11<br><br>Case No. 23-10082 (KBO) |
| In re:<br><br>AD1 Celebration Holdings, LLC<br><br>Debtor.      | Chapter 11<br><br>Case No. 23-10084 (KBO) |
| In re:<br><br>AD1 Celebration Hotels, LLC<br><br>Debtor.        | Chapter 11<br><br>Case No. 23-10085 (KBO) |
| In re:<br><br>AD1 Daytona Holdings, LLC<br><br>Debtor.          | Chapter 11<br><br>Case No. 23-10086 (KBO) |
| In re:<br><br>AD1 Daytona Hotels, LLC<br><br>Debtor.            | Chapter 11<br><br>Case No. 23-10087 (KBO) |

**ORDER, PURSUANT TO SECTION 105(a) OF THE  
BANKRUPTCY CODE, BANKRUPTCY RULE 1015, AND LOCAL RULE 1015-1,  
AUTHORIZING THE JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER 11  
CASES FOR PROCEDURAL PURPOSES ONLY**

Upon consideration of the motion (the “Motion”)<sup>1</sup> of the above-captioned affiliated debtors and debtors in possession (collectively, the “Debtors”)<sup>2</sup> for the entry of an order, pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015, and Local Rule 1015-1, authorizing the joint administration of the Debtors’ chapter 11 cases for procedural purposes only; and upon consideration of the Motion and all pleadings related thereto, including the First Day Declaration; and due and proper notice of the Motion having been given; and no other or further notice of the Motion being required; and the Court having jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and this being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having determined that it may enter a final order consistent with Article III of the United States Constitution; and venue of this proceeding and the Motion being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the relief requested in the Motion and provided for herein being in the best interest of the Debtors, their estates, and creditors; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.

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<sup>1</sup> Capitalized terms used but not otherwise defined shall have the meaning ascribed to them in the Motion.

<sup>2</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: AD1 Celebration Hotels, LLC (7980); AD1 Daytona Hotels, LLC (7940); AD1 LBV1, LLC (1125); AD1 PB Airport Hotels, LLC (6855); AD1 SW Property Holdings, LLC (2507); AD1 Urban Palm Bay, LLC (3713); AD1 Urban Palm Bay Place, LLC (2385); AD1 Celebration Holdings, LLC (3363); AD1 Daytona Holdings, LLC (2761); AD1 LBV Hotels, LLC (7709); AD1 Palm Beach Airport Hotels, LLC (2187); AD1 Urban Strategy Palm Bay, LLC (9412); and AD1 Urban SW, LLC (6934). The mailing address for each of the Debtors is 1955 Harrison Street, Suite 200, Hollywood, FL 33020.

2. The Debtors' chapter 11 cases shall be consolidated for procedural purposes only and shall be jointly administered in accordance with the provisions of Bankruptcy Rule 1015 and Local Rule 1015-1.

3. The Clerk of the Court shall maintain one file, one docket, and one consolidated service list for all of the Debtors' chapter 11 cases, which file and docket shall be the file and docket for the chapter 11 case of AD1 Urban Palm Bay, LLC, Case No. 23-10074 (KBO).

4. All pleadings filed in the Debtors' chapter 11 cases shall bear a consolidated caption substantially in the following form:

In re:

AD1 Urban Palm Bay, LLC, *et al.*,  
Debtors.<sup>1</sup>

Chapter 11

Case No. 23-10074 (KBO)

(Jointly Administered)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: AD1 Celebration Hotels, LLC (7980); AD1 Daytona Hotels, LLC (7940); AD1 LBV1, LLC (1125); AD1 PB Airport Hotels, LLC (6855); AD1 SW Property Holdings, LLC (2507); AD1 Urban Palm Bay, LLC (3713); AD1 Urban Palm Bay Place, LLC (2385); AD1 Celebration Holdings, LLC (3363); AD1 Daytona Holdings, LLC (2761); AD1 LBV Hotels, LLC (7709); AD1 Palm Beach Airport Hotels, LLC (2187); AD1 Urban Strategy Palm Bay, LLC (9412); and AD1 Urban SW, LLC (6934). The mailing address for each of the Debtors is 1955 Harrison Street, Suite 200, Hollywood, FL 33020.

5. The foregoing caption shall satisfy the requirements of section 342(c)(1) of the Bankruptcy Code.

6. All original pleadings shall be captioned as indicated in the preceding decretal paragraph 4, and the Clerk of the Court shall make docket entries in the dockets of each of the chapter 11 cases other than the chapter 11 case of AD1 Urban Palm Bay, LLC, substantially as follows:

An order has been entered in this case directing the consolidation and joint administration for procedural purposes only of the chapter

11 cases of AD1 Celebration Hotels, LLC; AD1 Daytona Hotels, LLC; AD1 LBV1, LLC; AD1 PB Airport Hotels, LLC; AD1 SW Property Holdings, LLC; AD1 Urban Palm Bay Place, LLC; AD1 Urban Palm Bay, LLC; AD1 Celebration Holdings, LLC; AD1 Daytona Holdings, LLC; AD1 LBV Hotels, LLC; AD1 Palm Beach Airport Hotels, LLC; AD1 Urban Strategy Palm Bay, LLC; and AD1 Urban SW, LLC. The docket in the chapter 11 case of AD1 Urban Palm Bay, LLC, Case No. 23-10074 (KBO), should be consulted for all matters affecting this case.

7. Nothing in the Motion or this Order is intended or shall be deemed or otherwise construed as directing or otherwise effecting a substantive consolidation of the Debtors' estates.

8. The Debtors and the Clerk of the Court are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

9. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.